

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC  
(PETRO),

Plaintiff,

vs.

ISLAND PROJECT AND OPERATING  
SERVICES, LLC (IPOS), VITOL US  
HOLDING II, CO., VITOL VIRGIN  
ISLANDS CORPS, (VVIC), ANDREW  
CANNING and OPTIS EUROPE, LTD.,  
(OPTIS),

Defendants.

CASE NO. 1:21-CV-00312

**BREACH OF CONTRACT**

JURY TRIAL DEMANDED

**NOTICE OF SERVICE OF PLAINTIFF PETRO'S FIRST SUPPLEMENTAL  
RESPONSE TO DEFENDANT VITOL'S THIRD SET OF INTERROGATORIES**

**PLEASE TAKE NOTICE** that Plaintiff, PETRO, has served its First Supplemental Response to Defendant VITOL's Third Set of Interrogatories through its respective counsel and that said documents were served upon the Defendant in the original.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: January 19, 2023

BY: /s/ Lee J. Rohn

Lee J. Rohn, Esq.  
VI Bar No. 52  
1108 King Street, Suite 3 (mailing)  
56 King Street, Third Floor (physical)  
Christiansted, St. Croix  
U.S. Virgin Islands 00820  
Telephone: (340) 778-8855  
lee@rohnlaw.com

**PETRO INDUSTRIAL SOLUTIONS, LLC V. IPOS, ET AL., CASE NO. 1:21-CV-00312  
NOTICE OF SERVICE OF PLAINTIFF PETRO'S FIRST SUPPLEMENTAL RESPONSE TO  
DEFENDANT VITOL'S THIRD SET OF INTERROGATORIES**

**Page 2**

**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on January 19, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

Alex Kaplan, Esq.  
Susman Godfrey  
1000 Louisiana St., Suite 5100  
Houston, TX 77002  
Email Address: akaplan@susmangodfrey.com  
Attorney For: Vitol US Holding Co., Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Andrew C. Simpson, Esq.  
Andrew C. Simpson, P.C.  
2191 Church Street, Suite 5  
Christiansted, VI 00820  
Email Address: asimpson@coralbrief.com  
Attorney For: Andrew Canning

Carl A. Beckstedt, III, Esq.  
Beckstedt & Kuczynski LLP  
2162 Church Street  
Christiansted, USVI 00820  
Email Address: carl@beckstedtlaw.com; tarsha@beckstedtlaw.com;  
gpark@susmanodfrey.com; akaplan@susmangodrfey.com  
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Simone Francis, Esq.  
Ogletree, Deakins, Nash, Smoak & Stewart, LLC  
The Tunick Building, Suite 201  
1336 Beltjen Road  
St. Thomas, VI 00802  
Email Address: simone.francis@ogletreedeakins.com  
Attorney For: Island Project and Operating Services, LLC

Y. Gloria Park, Esq.  
Susman Godfrey LLP  
1301 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Email Address: gpark@susmangodfrey.com  
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

BY: /s/ Lee J. Rohm (raw)